

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PAULA F. SOTO,

Plaintiff,

v.

C.A. No. 13-10822-JGD

CITY OF CAMBRIDGE,

Defendant.

JOINT STATUS REPORT

Plaintiff Paula F. Soto (“Soto”) and Defendant City of Cambridge (the “City”), through counsel, respectfully submit this Joint Status Report pursuant to the Scheduling Order entered by the Court on September 9, 2014 by Magistrate Judge Dein.

I. Status of the Case.

The parties are on schedule to complete all fact discovery by January 15, 2015 in compliance with the Court’s Scheduling Order. Both sides have served written discovery and produced documents. Additionally, Soto, through counsel, took the depositions of Vincent Best and Commissioner Robert C. Haas on September 24, 2014 and November 12, 2014, respectively.

II. Scheduling for the Remainder of the Case Through Trial.

The deadline to file any summary judgment motion is currently set for March 15, 2015. Since this date falls on a Sunday, the parties have agreed to set the deadline to file summary judgment motions for Monday, March 16, 2015. Plaintiff intends to submit a motion for summary judgment. The proposed pretrial schedule for the remainder of the case would be as follows:

Events	Proposed dates
Summary Judgment Motion	March 16, 2015 (Monday)
Responses to Summary Judgment Motion	April 15, 2015 (Wednesday)
Replies to Summary Judgment Motion	May 6, 2015 (Wednesday)
Settlement Conference	June 8, 2015 (Monday)
Final Pretrial Conference	July 6, 2015 (Monday)
Trial	To be scheduled for 60 days following the Court's decision on any Summary Judgment Motion.

III. The Use of Alternative Dispute Resolution.

The parties have been unable to reach an agreement on the use of alternative dispute resolution programs.

IV. Settlement.

The parties have discussed settlement but have not reached agreement at this time

Respectfully submitted,

January 5, 2014

/s/ Julia M. Ong

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CERTIFICATE OF SERVICE

I, Julia Ong, hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants on this 5th day of January, 2015.

/s/ Julia M. Ong
Julia M. Ong